

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA,

*Plaintiff,* Case No. 25-CR-08  
vs.

LI XING, et al,

*Defendants.*

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**JOINT UNOPPOSED MOTION FOR EXTENSION  
OF TIME TO FILE PRETRIAL MOTIONS**

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Defendants Li Xing, Kaiyu Huang, Shawn Senter, Kevin Eisenhauer, Shelton Thorton, Skylar Trumbo, John Perry, and Adham Blandin, by their respective counsel, move this court for an order modifying the scheduling order and extending the time to file pretrial motions to Friday, October 17, 2025. In support of this motion, counsel asserts:

1. On January 22, 2025, all defendants were indicted on a fourteen-count indictment charging various drug and gun offenses. Dkt. 1. On the government's motion, the Court designated the case as "complex." Dkt. 20. The Court held an initial scheduling conference on February 25, 2025, at which time the parties agreed to a speedy trial finding and a continued status hearing in approximately 60 days. Dkt. 36. At that time, not all defendants had appeared in the district. On April 25, 2025, the parties appeared before the Court for another scheduling conference. At that time, the defendants had all

appeared in the district, and the Court set a motions deadline of July 14, 2025. On July 14, 2025, by the parties' joint and unopposed motion, the scheduling order was modified in a text-only order to reflect a new pretrial motions deadline of August 29, 2025. Dkt. 79.

2. Similarly to the first motion to extend this deadline, the defendants require additional time to assess the viability of motions and confer with the government regarding any factual disputes and whether evidentiary hearings may be necessary. Additionally, several of the defendants are still involved in plea negotiations with the government which would obviate the need for any motions in those matters. Undersigned and other counsel have had heavily scheduled calendars and are involved in meeting other pressing deadlines.

3. This is the defendants' second request for an extension of time to file pretrial motions. A motions deadline in approximately 50 days should suffice to allow defendants and counsel the time to prepare any pretrial motions, confer with the government, and continue plea negotiations.

4. Counsel for the defendants have communicated with Assistant United States Attorney Katherine Halopka-Ivery, who has indicated that the government does not oppose this request.

For these reasons, defendants respectfully request that the Court extend the time for filing motions and modify the scheduling order to reflect that pretrial motions are to be filed on or before October 17, 2025; responses on or before November 3, 2025; and any

replies on or before November 10, 2025. The parties also ask that the Court make the appropriate speed trial findings.

Dated at Milwaukee, Wisconsin this 29<sup>th</sup> day of August, 2025.

Respectfully submitted,

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